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Attorneys for New England Health Care Employees Union, District 1199, SEIU

UNITED STATES BANKRUPTCY COURT

In re: Chapter	
<u>r</u>	11
710 Long Ridge Road Operating Company II, LLC, Case No	. 13-13653 (DHS)
Debtors. ¹ (Jointly A	Administered)
X	

NOTICE OF APPEAL

Notice is hereby given that the New England Health Care Employees Union, District 1199, SEIU ("Union" or "SEIU"), pursuant to Federal Rule of Bankruptcy Procedure 8001 and 28 U.S.C. § 158(a), hereby appeals to the United States District Court for the District of New

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal identification number are: 710 Long Ridge Road Operating Company II, LLC d/b/a Long Ridge of Stamford (4809) ("Long Ridge"), 240 Church Street Operating Company II, LLC d/b/a Newington Health Care Center (4730) ("Newington"), 1 Burr Road Operating Company II, LLC d/b/a Westport Health Care Center (4839) ("Westport"), 245 Orange Avenue Operating Company II, LLC d/b/a West River Health Care Center (4716) ("West River") and 107 Osborne Street Operating Company II, LLC d/b/a Danbury Health Care Center (4676) ("Danbury").

Jersey from the Bankruptcy Court's February 3, 2014 Opinion and Order [Docket Nos. 897 and 898] authorizing the Debtors to reject the continuing economic terms of the Debtors expired collective bargaining agreements with the Union and implement the terms of their proposal pursuant to 11 U.S.C. § 1113(c), and from the Bankruptcy Court's February Amended Order [Docket No. 917] (collectively, "1113(c) Decision"), attached hereto as Exhibits A-1, A-2 and A-3.

Additionally, pursuant to Federal Rule of Bankruptcy Procedure 8001 and 28 U.S.C. § 158(a), the Union appeals from the following interim opinions and orders of the Bankruptcy Court:

- 1. Order of March 4, 2013 [Docket No. 66], granting Debtors interim relief under 11 U.S.C. § 1113(e) (the "Initial 1113(e) Order"), attached hereto as Exhibit B; and
- 2. Order of April 10, 2013 [Docket No. 230], granting Debtors continued interim relief under 11 U.S.C. § 1113(e) (the "Second 1113(e) Order"), attached hereto as Exhibit C; and
- 3. Order of July 15, 2013 [Docket No. 424], granting Debtors continued interim relief under 11 U.S.C. § 1113(e) (the "Third 1113(e) Order"), attached hereto as Exhibit D; and
- 4. Order of November 22, 2013 [Docket No. 706], granting Debtors continued interim relief under 11 U.S.C. § 1113(e) (the "Fourth 1113(e) Order"), attached hereto as Exhibit E.

This Notice of Appeal grows out of the same transactions that were the subject of prior appeals in the United States District Court for the District of New Jersey regarding interim modifications to the Debtors' collective bargaining agreements pursuant to 11 U.S.C. § 1113(e).

These previous appeals were docketed at:

- 1. D.N.J. Case No. 13-cv-02977-DMC (Terminated 5/28/2013)
- 2. D.N.J. Case No. 13-cv-03247-CCC (Board's appeal of the First and Second 1113(e) Orders)
- 3. D.N.J. Case No. 13-cv-03248-DMC (Union's appeal of the First and Second 1113(e) Orders)
- 4. D.N.J. Case No. 13-cv-05320-CCC (Board's appeal of the Third 1113(e) Order)
- 5. D.N.J. Case No. 13-cv-05319-DMC (Union's appeal of the Third 1113(e) Order)
- 6. D.N.J. Case No. 14-cv-00397-DMC (Board's appeal of the Fourth 1113(e) Order)
- 7. D.N.J. Case No. 14-cv-00381-DMC (Union's appeal of the Fourth 1113(e) Order)

The names of all parties to the orders appealed from, and the names, addresses and telephone numbers of their respective attorneys, as well as other relevant parties, are as follows:

710 Long Ridge Road Operating Company II, LLC d/b/a Long Ridge of Stamford; 240 Church Street Operating Company II, LLC d/b/a Newington Health Care Center; 1 Burr Road Operating Company II, LLC d/b/a Westport Health Care Center; 245 Orange Avenue Operating Company II, LLC d/b/a West River Health Care Center; 107 Osborne Street Operating Company II, LLC d/b/a Danbury Health Care Center.

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Dated: February 14, 2014

Respectfully submitted,

/s/ Susan J. Cameron

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